

1 KEVIN V. RYAN, SBN 118321
United States Attorney
2 JOANN M. SWANSON, 88143
Assistant United States Attorney
3 Chief, Civil Division
SARA WINSLOW, DCBN 457643
4 Assistant United States Attorney

E-FILED 7/17/06

5 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
6 Telephone: (415) 436-7260
Facsimile: (415) 436-7169
7

8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 IRENE E. KATALIN,	}	
13 Plaintiff,		CIVIL NO. 05-02382 RS
14 v.		STIPULATION AND ORDER EXTENDING
15 JO ANNE B. BARNHART,		DEFENDANT'S TIME TO FILE
16 Commissioner of Social Security,		RESPONSE TO PLAINTIFF'S
17 Defendant.	}	MOTION FOR SUMMARY JUDGMENT

18 IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the
19 approval of the Court, that defendant Commissioner may have an extension of 30 days in which to
20 file her response to plaintiff's motion for summary judgment.¹ Defendant's response was due on July
21 17, 2006, pursuant to Civil L.R.16-5. Defendant's response is now due on August 16, 2006.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

¹ See attached Declaration of Mary P. Parnow.

1 This is defendant's first request.
2
3
4

5 Dated: July 10, 2006

/s/
HARVEY P. SACKETT
Attorney for Plaintiff

7
8 KEVIN V. RYAN
United States Attorney
9

10
11
12 Dated: July 11, 2006

By: /s/
SARA WINSLOW
Assistant United States Attorney
13

14 PURSUANT TO STIPULATION, IT IS SO ORDERED:
15
16
17

18
19 Dated: 7/17/06


RICHARD SEEBORG
United States Magistrate Judge
20
21
22
23
24
25
26
27
28

1 KEVIN V. RYAN, CSBN 118321
United States Attorney
2 JOANN M. SWANSON, SBN 88143
Chief, Civil Division
3 SARA WINSLOW, DCBN 457643
Assistant United States Attorney
4 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
5 Telephone: (415) 436-7260

6 Attorneys for Defendant

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 IRENE E. KATALIN,

11 Plaintiff,

12 v.

13 JO ANNE B. BARNHART,
Commissioner of
14 Social Security,

15 Defendant.
16

CIVIL NO. 05-2382 RS

DECLARATION OF MARY P. PARNOW
IN SUPPORT OF DEFENDANT'S REQUEST
FOR EXTENSION OF TIME

17 I, Mary P. Parnow, declare and state as follows:

18 1. I am an Assistant Regional Counsel in the Office of the General Counsel for the United
19 States Social Security Administration ("SSA"), Region IX.

20 2. This case is presently before the Office of Hearings and Appeals, Appeal Council pending
21 review for purposes of settlement. This is the defendant Commissioner's first request for an extension.
22 In order to ensure that this Appeal's Council review can be completed, I am requesting a further 30 day
23 extension.
24
25
26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

2 Executed in San Francisco, California on July 7, 2006.

3
4
5 By /s/
6 MARY P. PARNOW
7 Assistant Regional Counsel
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28